

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
BIG LOTS, INC., <i>et al.</i> ,	Case No. 24-11967 (JKS)
Debtors.	(Jointly Administered)
	Objection Deadline: 2/5/2025 at 4:00 p.m. (ET)
	Hearing Date: 2/26/2025 at 10:30 a.m. (ET)

**NOTICE OF MOTION OF TEMPUR SEALY
INTERNATIONAL, INC. FOR ALLOWANCE AND IMMEDIATE
PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

PLEASE TAKE NOTICE that on January 14, 2025, Tempur Sealy International, Inc., on behalf of itself and its affiliates (collectively, “TSI”) filed the *Motion of Tempur Sealy International, Inc. for Allowance and Immediate Payment of Administrative Expense Claim* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (this “Court”) on or before **February 5, 2025, at 4:00 p.m. ET** (the “Objection Deadline”) and served on, so as to be received by, the undersigned counsel on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Court at such hearing.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held at the Court on **February 26, 2025, at 10:30 a.m. ET** before the Honorable J. Kate Stickles, United States Bankruptcy Judge for the District of Delaware, at 824 Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware, 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

[Signature page follows]

Dated: January 14, 2025
Wilmington, Delaware

Respectfully submitted,
LAW OFFICE OF SUSAN E. KAUFMAN, LLC

/s/ Susan E. Kaufman
Susan E. Kaufman (DSB# 3381)
919 N. Market Street, Suite 460
Wilmington, DE 19801
Tel: (302) 472-7420
Fax: (302) 792-7420
Email: skaufman@skaufmanlaw.com

-and-

Ronald E. Gold (OH Bar No. 0061351)
(Admitted *pro hac vice*)
FROST BROWN TODD LLP
3300 Great American Tower
301 East Fourth Street
Cincinnati, OH 45202
Tel: (513) 651-6800
Fax: (513) 651-6981
Email: rgold@fbtlaw.com

-and-

Rebecca L. Matthews (TX Bar No. 2406776)
(Admitted *pro hac vice*)
FROST BROWN TODD LLP
2101 Cedar Springs Road, Suite 900
Dallas, TX 75201
Tel: (214) 580-5852
Fax: (214) 545-3473
Email: rmatthews@fbtlaw.com

Counsel for Tempur Sealy International, Inc.